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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PIROUZ SEDAGHATY,

Defendant.

CR 05-60008 HO

**DECLARATION IN SUPPORT OF
MOTION TO COMPLETE
RECORD**

Defendant Pirouz Sedaghaty, through counsel, Lawrence Matasar and
Federal Public Defender Steven T. Wax, hereby submits the attached

declaration in support of a portion of his Motion To Complete The Record. CR 582, 585. The declaration discusses the agreement reached with the government at the time Mr. Sedaghaty delivered material to the SCIF in Washington, D.C. (*See* Tr. 11/23/10, 178-79) and was submitted to the United States Court of Appeals for the Ninth Circuit in Support of Mr. Sedaghaty's Petition for Mandamus (No. 09-73924).

RESPECTFULLY SUBMITTED this 5th day of October, 2011.

/s/ Steven T. Wax

Steven T. Wax

Federal Public Defender

/s/ Lawrence H. Matasar

Lawrence H. Matasar